Amy Shardlow
Planning Service
Medway Council
Sent via email

**Application Ref:** MC/25/2342
**Representation:** Objection
**Date:** 4 December 2025

**Location:** 80 Chatham Hill, Chatham, Medway, ME5 7AN

**Proposal:** Conversion of existing lower ground, first and second floors to seven self-contained flats (Class C3) together with construction of two dormer windows to rear to provide additional living accommodation within roof space and associated external alterations

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Dear Amy,

The application site is covered by the Arches Chatham Neighbourhood Plan (ACNP), which was adopted by Medway Council on 15 May 2024.

The following policies from the ACNP have been considered in our assessment of the proposal.

| **Arches Chatham Neighbourhood Plan Policy** | **Compliance** |
|---|---|
| Policy HO2 - Beautiful Design | No |
| Policy HO6 - Outdoor Space | No |
| Policy BNE6 - Non-designated Heritage Assets | No |
| Policy ST4 - Parking | To be determined by Case Officer |

We wish to object to this application and our reasons are set out below.

**Design**

Policy HO2 of the ACNP states that proposals should respect the scale, density and identified valued characteristics of the Neighbourhood Area. The Design Code further requires ornamentation to be included in all new developments, and that materials should match and enhance those in the existing area.

The application site is the former White Horse pub, rebuilt in 1903 to the designs of prolific local architect George Edward Bond. Sources suggest that a public house existed on this site as early as 1828. Due to its historical significance by association with George Edward Bond and its social interest as a former pub, in our view the building should be considered a non-designated heritage asset. Therefore, extra consideration in planning decision making is required to ensure the development is sympathetic.

Policy BNE6 of the ACNP deals with the matter of non-designated heritage assets. It states that proposals which directly or indirectly affect non-designated heritage assets should demonstrate the benefits of the development outweigh any loss of significance of the asset and cannot otherwise be provided in a less harmful manner.

The proposal seeks minor external alterations to the rear of the building in the form of new window insertions on the lower ground floor and the construction of two roof dormers.

Turning to the roof dormers firstly, the elevational drawings appear to show these would sit higher than the three gables to the front of the hipped roof. Furthermore, it appears the tallest point of the dormers would be flush with the ridgeline of the main roof. Whilst we acknowledge the direct views to the dormers would be limited, they will be visible in surrounding views from Chatham Hill (westbound) and Whitehorse Hill.

Due to their size and incongruous relationship with the other aspects of the existing roof, we are concerned the dormers would be unsympathetic to the host building and may cause minor harm to the non-designated heritage asset.

Secondly, the window insertions on the lower ground floor consist of horizontal lintels that do not match the existing segmental arch lintels on the south west (rear) elevation. The Design Code is very clear and specific that poor quality attempts at ornamentation, such as soldier course lintels, will not be accepted. In this case, the proposal fails to comply with the Design Code and it would therefore have a harmful impact on the appearance of the host building.

As a result, the proposal does not comply with Policy HO2 and Policy HO6 of the ACNP.

**Amenity of Future Occupants**

Policy BNE2 of the Medway Local Plan 2003 and Paragraph 135f of the NPPF relate to the protection of the living conditions which would be created for potential occupants of the development. Additionally, Policy HO6 of the ACNP requires all new developments to provide high quality outdoor space for use by occupants.

With regards to sunlight, daylight and outlook, the lower ground floor would be served only by windows that face the neighbouring property, 23 Whitehorse Hill. The distance between the proposed windows and the neighbouring property is also very limited. We note that no supporting sunlight/daylight information has been provided to justify this is suitable.

In terms of amenity space, the Medway Housing Standards (interim) 2011 (MHDS) states that flats should have access to a minimum 5sqm private outdoor space. The proposal does not include any private outdoor space, as there is only a paved area in-between the application site and the neighbouring property at 23 Whitehorse Hill. Although, this would only serve as a rear pedestrian access route and for bin storage.

By virtue of the inadequate outlook and daylight to the lower ground floor and the lack of outdoor space, the proposed development would provide unacceptable quality living conditions for future occupiers. Consequently, the proposal is contrary to Policy HO6 of the ACNP and Policy BNE2 of the Medway Local Plan 2003.

**Parking**

Policy ST4 of the ACNP sets out that developments that rely on opportunistic on-street parking should be supported by a parking stress survey. Furthermore, Medway Council's Interim Parking Standards allow reductions in parking provision within an urban area that has good links to sustainable transport and where day-to-day facilities are within easy walking distance.

Given its location close to a bus stop on Chatham Hill with frequent services and day-to-day facilities being within relatively easy walking distance to Chatham High Street and Luton Road, the location may be considered sustainable.

The proposal would not be provided with any car parking provision or secure cycle storage. We note the proposed intensification of the building use, together with the existing hot food takeaway on the ground floor, may increase the resultant comings and goings.

If this application is approved despite our recommendation for refusal, a parking management plan and secure cycle storage should be conditioned to prevent any impact on the surrounding area, which is already under significant parking stress.

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In conclusion, we request this application be refused permission. Please do not hesitate to contact us should you require any further information.

Yours sincerely,

Arches Chatham Neighbourhood Forum

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